

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting and
Corrective Action Branch
1011 North Grandview Avenue
Glendale, California 91201

Project Title: Closure Plan Amendment for Gallade Chemical Incorporated's Hazardous Waste Drum Storage Area

Project Location: 1230 Saint Gertrude Place, City of Santa Ana

County: Orange

Project Description: DTSC is amending the Gallade Chemical, Incorporated's (Gallade) Closure Plan (CP) that DTSC approved in October 1995 to close the hazardous waste drum storage area (HWDSA) with waste in place and to require post-closure care, including deed notification and Land-use Covenant. Post-closure care shall include continuation of the groundwater pump-and-treat and dual phase soil vapor extraction (SVE) to clean up the affected environmental media until the closure performance standard can be met.

Background:

The objective of the previously approved CP was to determine if residues of chemicals from the hazardous waste drum storage area (HWDSA) had resulted in the hazardous wastes releases to concrete and soils beneath the HWMU. Its goal was to achieve a "clean closure" standard for the HWDSA. "Clean closure" meant that the closure sampling could demonstrate that there were no hazardous wastes and constituents in the environmental media that were connected to releases from the HWDSA or that if such releases were demonstrated that a health risk assessment (HRA) would be performed, subsequent cleanup performed such that any residual waste would meet the HRA criteria. Clean closure has been determined to be infeasible.

Under the previously approved CP, wipe, concrete, and soil samples were collected in five (5) locations after the HWDSA had been decontaminated. Even after decontamination the wipe samples indicated residual tetrachloroethene (PCE) in both middle and bottom concrete chip samples and found in soil at twelve (12) inches below the concrete. Concentrations to 7,994 micrograms per kilograms (ug/kg) of PCE were encountered in the soils underlying the HWDSA. Soil collected immediately below the concrete pad contained concentrations of trichloroethane (TCA) up to 465 ug/kg and varying concentrations of other volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals. One well installed in the vicinity of the HWDSA has previously exhibited (in 1990) as much as 100,600 ug/l of total VOCs in ground water (because of on-going groundwater extraction and treatment, this has been reduced substantially). The presence of VOCs in the concrete, soils, and ground water at the HWDSA lead to DTSC's determination that the HWDSA had released contamination to the underlying ground water.

Currently, the Santa Ana Regional Water Quality Control Board (SARWQCB) is the lead agency for corrective action at the Facility. Two cleanup technologies are currently being implemented by Gallade under SARWQCB oversight include: a) groundwater pump-and-treat; and, b) dual phase soil vapor extraction (SVE). Because of the operation of the SVE, no soil removal is being required and DTSC has concurred with the SARWQCB that this on-going corrective action clean-up will also ultimately serve to clean-up the soils and ground water impacted by the releases from the HWDSA. For example the groundwater concentrations in a well adjacent to the HWDSA are significantly diminishing. However, it is evident from the data over the last 5 years that the original closure performance standard cannot be achieved in a reasonable time frame. Therefore, DTSC is proposing to modify the CP to close the HWDSA with waste in place and to require post-

closure care which shall include continuation of the groundwater pump-and-treat and SVE to clean up the affected environmental media until the closure performance standard can be met.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Gallade Chemical, Incorporated

Exemption Status: (check one)

- ☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
☐ Categorical Exemption: [State type and section number]
☐ Statutory Exemptions: [State code section number]
☒ General Rule [CCR, Sec. 15061 (b) (3)]

Exemption Title: Title 14, California Code of Regulations, Section 15061 (b) (3) - No possibility of significant effect on the environment.

Reasons Why Project is Exempt: The proposed project will have no significant effect on the environment, because:-

- 1) No significant disturbance will occur since the cleanup technologies are already in place;
- 2) Soil excavation and removal will not be performed. Demolition and removal of concrete that was approved in the original closure plan will be completed with no modification;
- 3) Currently the SARWQCB, as the lead agency, has undertaken clean-up of site-wide soil and ground water for the Solid Waste Management units (SWMUs) at the Facility. As a result of diminishing concentrations in ground water adjacent to the HWDSA, DTSC believes that the cleanup is significantly reducing the threat to human health and environment. The nature of the technologies being employed means that the HWDSA unit is subject to clean-up as well as the SWMUs;
- 4) The Facility is located in an industrialized area. The proposed industrial land use covenant will not affect future planned land uses; and will assure that the on-going cleanup under the SARWQCB authority will not be impaired;
- 5) The Facility is secured with fencing and locks, and restricted to public access;
- 6) Once closure with waste-in-place is completed, a post-closure care plan will be required. This plan must include a health risk evaluation and the soil vapor and ground water clean-up goals that must be achieved prior to terminating soil vapor and groundwater treatment. CEQA requirements will be met for the future DTSC approval of a post-closure care plan.
- 8) There are no known historical features or cultural resources located at the Facility;
- 9) The Facility location is not in an area of biological significance and does not contain critical habitat for sensitive, threatened, or endangered species;
- 10) Although the site is on the Hazardous Waste and Substances Sites List, pursuant to Government Code section 65962.5, the project includes measures to remediate the source of the listed contamination and will restrict future uses of the property that are not consistent with the current contamination and such remediation.

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